

RECEIVED
CENTRAL FAX CENTER

JUN 19 2006

Docket No.: P2001,0097

CERTIFICATION OF MAILING OR TRANSMISSION

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to the Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 or facsimile transmitted to the U.S. Patent and Trademark Office on the date shown below.

MAIL STOP: APPEAL BRIEF-PATENTS

By: 

Date: June 19, 2006

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
Before the Board of Patent Appeals and Interferences

Applic. No.	:	10/075,656	Confirmation No.:	9370
Inventor	:	Detlev Richter		
Filed	:	February 13, 2002		
Title	:	Semiconductor Module with a Configuration for the Self-Test of a Plurality of Interface Circuits and Test Method.		
TC/A.U.	:	2133		
Examiner	:	John J. Tabone, Jr.		
Customer No.	:	24131		

Hon. Commissioner for Patents
Alexandria, VA 22313-1450

SUBSTITUTE BRIEF ON APPEAL

Sir:

This is an appeal from the final rejection in the Office action dated September 6, 2005, finally rejecting claims 1-13, and additionally responding to a Notice of Non-Compliant Appeal Brief mailed June 6, 2006. The fee of \$500.00 for the filing of an Appeal Brief was previously submitted on March 10, 2006.

Page 1 of 20

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

RECEIVED
CENTRAL FAX CENTER

JUN 19 2006

Real Party in Interest:

This application is assigned to Infineon Technologies AG of München, Germany.

The assignment will be submitted for recordation upon the termination of this appeal.

Related Appeals and Interferences:

No related appeals or interference proceedings are currently pending which would directly affect or be directly affected by or have a bearing on the Board's decision in this appeal.

Status of Claims:

Claims 1-13 are rejected and are under appeal.

Status of Amendments:

Appellant's claims 1 - 13 were rejected in a final Office Action mailed September 6, 2005 (the "**final Office Action**"). In response to the **final Office Action**, Appellant filed a Response under 37 C.F.R. § 1.116 on December 6, 2005 (the "**Response**").

No claims were amended after the final Office action

The Primary Examiner stated in an *Advisory Action* dated December 29, 2005 that claims 1-13 had been rejected. The *Advisory Action* further stated, with regard to the patentability of the claims, that the **Response** did not place the application in condition for allowance because:

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

The new arguments presented by the Applicant concerning independent claims 1 and 7 will require further consideration. [emphasis added by Appellant].

A Notice of Appeal was filed on January 10, 2006.

Summary of Claimed Subject Matter:

Independent claim 1 recites a semiconductor module (Fig. 1, 10; Fig. 2, 100) with a configuration for the self-test of a plurality of bidirectionally operating interface circuits (page 3, lines 16 - 19), comprising:

first and second equally sized groups of interface circuits (Fig. 1, 12a, 12b, 14a, 14b; Fig. 2, 112, 114), wherein each interface circuit of said first group (Fig. 1, 12a, 12b; Fig. 2, 112) is assigned exactly one interface circuit of said second group (Fig. 1, 14a, 14b; Fig. 2, 114) (page 5, lines 13 - 15; page 6, lines 4 - 11);

a respective electrical connection (Fig. 1, 52, 54; Fig. 2, 152, 154) of the interface circuits of said first and second groups to outside of the semiconductor module, for enabling a self-test (page 11, line 21 - page 12, line 2; page 14, lines 1 - 9);

a first circuit (Fig. 1, 32a, 32b; Fig. 2, 132) connected to said first group (12a, 12b; 112) and serving to generate test signals to be multiplexed in and output via said interface circuits of said first group (Fig. 1, 12a, 12b; Fig. 2, 112; page 12, lines 13 - 15; page 13, lines 21 - 22);

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

a second circuit (Fig. 1, 30; Fig. 2, 130) connected to said second group (Fig. 1, 14a, 14b; Fig. 2, 114) for receiving and processing test signals received via said interface circuits of said second group (Fig. 1, 14a, 14b; Fig. 2, 114; page 12, lines 15 - 17; page 13, lines 22 - 24); and

a respective separate voltage supply (Fig. 1, 18, 19; Fig. 2, 118, 119) for said first and second groups of interface circuits (page 10, line 25; page 13, lines 18 - 21).

Claim 7 recites a self-test method, which comprises the following steps:

providing a semiconductor module (Fig. 1, 10; Fig. 2, 100) according to claim 1 and testing the bidirectionally operating interface circuits (Fig. 1, 12a, 12b, 14a, 14b; Fig. 2, 112, 114) of the semiconductor module by (page 4, line 15 - 17)

connecting the assigned interface circuits of the first and second groups of interface circuits (Fig. 1, 12a, 12b, 14a, 14b; Fig. 2, 112, 114) outside the module (page 4, lines 18 - 19; page 6, lines 8 - 11);

supplying the two groups of interface circuits with a separate supply voltage (Fig. 1, 18, 19; Fig. 2, 118, 119; page 10, line 25; page 13, lines 18 - 21);

generating test signals, coupling in the test signals, and outputting the test signals via the first group (12a, 12b; 112) of interface circuits (page 12, lines 13 - 15; page 13, lines 21 - 22);

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

receiving the test signals via the second group (Fig. 1, 14a, 14b; Fig. 2, 114)
of interface circuits (page 12, lines 15 - 17; page 13, lines 22 - 24); and

comparing the received test signals with prescribed values for fault-free
functioning of the interface circuits (page 5, lines 7 - 8; page 7, lines 18 - 21;
page 8, lines 4 - 6; page 12, lines 9 - 11)

Grounds of Rejection to be Reviewed on Appeal

1. Whether or not claims 1 - 5, 7 - 10, 12 and 13 are anticipated by U. S. Patent No. 6,477,674 to Bates et al. ("BATES") under 35 U.S.C. §102(e).
2. Whether or not claim 6 is obvious over **BATES** in view of U. S. Patent No. 6,704,897 to Takagi ("TAKAGI") under 35 U.S.C. §103.
3. Whether or not claim 11 is obvious over **BATES** in view of U. S. Patent No. 5,751,151 to Levy et al ("LEVY") under 35 U.S.C. §103.

Argument:

- I. **Whether or not claims 1 - 5, 7 - 10, 12 and 13 are anticipated by U. S. Patent No. 6,477,674 to Bates et al. ("BATES") under 35 U.S.C. §102(e).**

In item 3 of the **final Office Action** mailed September 6, 2005 (the "**final Office Action**"), Appellant's claims 1 - 5, 7 - 10, 12 and 13 were rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U. S. Patent No. 6,477,674 to Bates et al ("**BATES**").

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

Appellant respectfully traverses the above rejections of the claims.

A. Appellant's independent claim 1 is patentable over the BATES reference.

Appellant's claim 1 recites, among other limitations:

first and second equally sized groups of interface circuits, wherein each interface circuit of said first group is assigned exactly one interface circuit of said second group; [emphasis added by Appellant]

As such, Appellant's claim 1 requires, among other things, a **1:1 correspondence between interface circuits of a first group and interface circuits of a second group** (i.e., each interface circuit of the first group being assigned to **exactly one** interface circuit of the second group).

Further, Appellant's claim 1 additionally recites, among other limitations:

a respective electrical connection of the interface circuits of said first and second groups to outside of the semiconductor module, for enabling a self-test; [emphasis added by Appellant]

As such, Appellant's claimed invention requires, among other things, **electrical connections to the first and second interface circuits, for enabling a self-test.**

Appellant believes that the **BATES** reference fails to teach or suggest: 1)

Appellant's particularly claimed 1:1 correspondence between the interface circuits of the first and second groups; and 2) the electrical connections from the interface circuits for self-testing.

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

More particularly, **BATES** discloses a method and apparatus for conducting input/output loopback tests using a local pattern generator and delay elements. **BATES** discloses an integrated circuit including a plurality of I/O buffers, each of which includes an I/O test circuit that generates test pattern signals whenever the integrated circuit is operating in a loopback test mode. See the Abstract of **BATES**.

Pages 2 - 3 of the **final Office Action** state, in part:

The Applicant argues on pages 9 and 10 "However, **BATES** does not particularly disclose much about these 'other IC 100 devices'. For example, **BATES** does not particularly disclose whether these 'other IC 100 devices' are arranged in a second group of input/output buffers or if such a 'second group' comprises the same number of input/output buffers as the first group . . .". In response to Applicant's argument the Examiner would like to refer the Applicant back to Figure 5, which is a block diagram of one embodiment of an integrated circuit (IC) 500 that includes input/output (I/O) buffers 100(1)-100(n). I/O buffers 100(1)-100(n) make up a data block of I/O circuitry for transmitting to and receiving data from other IC 100 devices. The "other IC 100 devices" **Bates** is referring to, **as interpreted by the Examiner**, is a duplication of IC 500 that includes other groups of input/output (I/O) buffers 100(1)-100(n), which qualifies the "other IC 100 devices" as the second group. **Bates** continues to teach that a data block includes sixteen (16) I/O buffers 100. However, in other embodiments, a data block may include other multiples (e.g., 2, 4, 8, 12, 18, 32, 40, 64, etc.) of I/O buffers 100. (Col. 4, ll.28 - 37). **It stands to reason to one skilled in the art that the I/O buffers 100 (i.e. as well as other IC 100 devices) are groups that are duplicated and therefore, comprises the same number of input/output buffers as the first group.** In light of the arguments presented above, **the Examiner's only conclusion** is that **Bates** substantially teaches "first and second equally sized groups of interface circuits, wherein each interface circuit of said first group is assigned exactly one interface circuit of said second group;" and "a first circuit connected to said first group and serving to generate test signals to be multiplexed in and output via said interface circuits of said first group; a second circuit connected to said second group for receiving and processing test signals received via said interface circuits of said second group;" [emphasis added by Appellant]

Appellant respectfully traverses the above statement from the **final Office Action**.

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

BATES does not explicitly state or show that "other IC 100 devices" are I/O devices in equal number to and/or correspond in a 1:1 relationship with the I/O devices 100(1) - 100(n) shown in Fig. 5. This is supported by the above quoted section of the Office Action.

Further, in countering Appellant's arguments to this effect, the Office Action uses such phrases as "as interpreted by the Examiner", "It stands to reason to one skilled in the art that", and "the Examiner's only conclusion", which implies that the standard being used to apply **BATES** to Appellant's claims is one of **obviousness**. However, Appellant notes that Appellant's independent claims 1 and 7, including the above limitations, as well as other claims, were rejected under 35 U.S.C. § 102(e), which section regards alleged anticipation by a reference. As stated in MPEP § 706.02:

IV. DISTINCTION BETWEEN 35 U.S.C. 102 AND 103

The distinction between rejections based on 35 U.S.C. 102 and those based on 35 U.S.C. 103 should be kept in mind. Under the former, the claim is anticipated by the reference. No question of obviousness is present. In other words, for anticipation under 35 U.S.C. 102, the reference must teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present. Whereas, in a rejection based on 35 U.S.C. 103, the reference teachings must somehow be modified in order to meet the claims. The modification must be one which would have been obvious to one of ordinary skill in the art at the time the invention was made. See MPEP § 2131 - § 2146 for guidance on patentability determinations under 35 U.S.C. 102 and 103. [emphasis added by Appellant]

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

As such, it appears that a standard of **obviousness**, and **not anticipation**, is being applied against Appellant's claims, and it is respectfully requested that the present rejection be reversed.

In response to the above, in the *Advisory Action*, the Examiner stated:

As for Applicant traversing the Examiner's characterization of certain features in the claims, the Examiner would like to remind the Applicant that the claims are to be given the broadest reasonable interpretation (See MPEP § 2111), which is a requirement of the Examiner for ALL claims and for ALL rejections, 102 or 103. Further, the Examiner never used the phrase "it would be obvious to one [sic] skilled in the art" or any other phrases that would constitute obviousness. As such, the Examiner maintains the rejection as set for [sic] in the Final Office Action of Record dated 08/09/2005 [sic].

Appellant notes that, at least in connection with the 35 U.S.C. § 102(e) rejections of claims 1 and 7, the Examiner did not use the phrase "it would be obvious to one skilled in the art". However, Appellant reiterates that in response to Appellant's previous arguments for the patentability of claims 1 and 7, on pages 2 - 3 of the **final Office Action**, the Examiner stated, among other things that:

It stands to reason to one skilled in the art that the I/O buffers 100 (i.e. as well as other IC 100 devices) are groups that are duplicated and therefore, comprises the same number of input/output buffers as the first group. [emphasis added by Appellant]

(See also the previous discussion, above). As such, although the Examiner did not use the phrase "it would be obvious to one skilled in the art" in connection with claims 1 and 7, the phrase used ("it stands to reason to one skilled in the art that") is a direct synonym, and that the standard being applied to Applicant's claims is one of obviousness, and not anticipation.

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

However, as stated above, Appellant believes that **BATES** does not teach or suggest that "other IC 100 devices" are I/O devices in equal number to and/or correspond in a 1:1 relationship with the I/O devices 100(1) - 100(n) shown in Fig. 5, if, in fact, a standard of obviousness (i.e., "It stands to reason to one skilled in the art") is being applied to Appellant's claims 1 and 7, Appellant believes that the current rejections be reversed and a new Office Action stating the proper reasons for rejection be issued.

Further, Appellant maintains its belief that the **BATES** reference fails to teach or suggest, among other limitations of Appellant's claim 1, the particularly claimed 1:1 correspondence between the interface circuits of the first and second groups. Page 5 of the **final Office Action** again points to col. 4 of **BATES**, lines 28 - 36, as allegedly disclosing Appellant's particularly claimed first and second equally sized groups of interface circuits. Appellant respectfully disagrees. Col. 4 of **BATES**, lines 28 - 36, states:

FIG. 5 is a block diagram of one embodiment of an integrated circuit (IC) 500. IC 500 includes input/output (I/O) buffers 100(1)-100(n). I/O buffers 100(1)-100(n) make up a data block of I/O circuitry for transmitting to and receiving data from other IC 100 devices.

Col. 4, lines 32 - 36 of **BATES** identifies the number of buffers illustrated in Figure 5.

However, Appellant maintains that Fig. 5 of **BATES** only discloses one single plurality of buffers 100(1) - 100(n). More particularly, Appellant maintains that **BATES** fails to teach or suggest that each of the buffers 100(1) - 100(n) of Fig. 5 of

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

BATES is assigned to one respective corresponding interface circuit or buffer of a second, equally sized group of interface circuits.

Col. 4 of **BATES**, lines 50 - 52 merely discloses that, in general, input/output buffers 100 maybe connected to one another. However, this disclosure in **BATES** refers to **normal operation mode but not to test mode**. Furthermore, in **BATES'** normal mode of operation, input/output buffers of the integrated circuit usually are connected to input/output buffers of another integrated circuit, but not to further input/output buffers of the same integrated circuit. In normal operation of a device, when plural integrated circuits are provided and connected to one another within a larger electronic component, **input/output buffers of a first integrated circuit will not be connected to further input/output buffers of the same integrated circuit chip** but only to input/output buffers of the second (perhaps identical) integrated circuit chip. Otherwise, the input/output buffers would not to be called "input/output" buffers, because, in normal operation mode, any "input/output" buffers are forwarding signals either leaving or arriving at the chip.

Further, the Examiner's "conclusion", made in the **final Office Action**, is contradictory to the technical teachings of **BATES**. Fig. 1 of **BATES** illustrates one single buffer 100, including a test circuit 110 for test pattern generation, an output driver (comprising elements 115, 120, 125 and 130) and an input receiver (comprising elements 145 and 150). In **BATES'** normal operation mode, signals may be forwarded from the core (See Fig. 1 of **BATES**, upper left corner) via the output driver and the input/output pad 135 to another chip. Alternatively, signals arriving at

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

the chip, via pad 135 of Fig. 1 of **BATES**, may be sent via the input receiver to the core (See Fig. 1 of **BATES**, bottom left corner).

According to **BATES**, the input/output buffers 100 each include a test circuit 110 for performing a self-test of the respective input/output buffer. This test is referred to as the "I/O loopback test" in **BATES**, col. 1, line 33, col. 2, line 47, column 3, lines 34 and 48 and column 6, line 25. In **BATES**', a respective buffer 100 is tested during the I/O loopback self-test to determine whether the respective buffer is defective. As such, the loopback self-test of **BATES** performs a test within, and only within, the respective buffer electrical path including elements 115, 120, 125, 130, 145, 150, 110 to test if the respective buffer is operating properly. In particular, in the test mode of **BATES** no test signals are leaving the respective buffer 100 under test, via the input/output pad 135 (Fig. 1 of **BATES**) since only the internal electronic components of the respective buffer 100 are tested.

Fig. 2 of **BATES** illustrates a detailed view of the I/O test circuit 110 which serves to generate the test pattern signals. **BATES**' test circuit 110 includes a test pattern generator 210, an output line connected to MUX 115 of the buffer 100 (compare Figs. 1 and 2 of **BATES**) and an input line for receiving input signals incoming from amplifier 145 (compare Figs. 1 and 2 of **BATES**; and col. 3, lines 62 - 64 of **BATES**). Further, the test circuit 110 illustrated in Fig. 2 OF **BATES** (and provided in each input/output buffer 100, as illustrated in Fig. 1 of **BATES**) includes a stage 215. Col. 3 of **BATES**, lines 60 - 64, states:

According to one embodiment, stage unit 215 provides a one cycle delay

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

for the test pattern signals before they are transmitted to compare unit 220 be compared with test signals received from amp 145.

As such, the stage unit 215 of **BATES** serves to directly connect the generated test pattern signal to the compare unit 220. See **BATES**, Fig. 2. By this way, in **BATES**, a duplicated test pattern signal is provided for comparison with the signal received from amplifier 145. See **BATES**, col. 5, lines 65 - 67.

In reviewing Fig. 1 and 2 of **BATES** in context with one another, it becomes apparent that each buffer 100 includes a test circuit 110 generating a test signal, which, in the form of a first duplicate signal, is passed across elements 115, 120, 125, 130, 145, 150 within the respective buffer 100, before again arriving in the test circuit 110 for comparison in the compare unit 220. The second duplicate signal is sent directly within the test circuit 110 to the stage 215 and from the stage 215 to the compare unit 220. Note that each buffer 100 shown in Figs. 1 and 5 of **BATES**, must include its own, respective test circuit 110, which only serves to test the respective individual buffer 100.

When this self-test of the respective buffer is performed in **BATES**, no electrical connection to any other second corresponding input/output buffer 100 is made, at all. In particular, during the self-test mode for a particular buffer in **BATES**, no test signal is leaving the respective buffer 100 via the input/output pad 135 or being sent to an input/output pad 135 of a second respective input/output buffer.

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

In **BATES**, plural buffers may be connected to one another, but only in normal operation mode and only to buffers of another chip. In the test mode of **BATES**, however, the closed loop for the test pattern signal extends only within the respective buffer 100, starting from the test circuit 110, and arriving back at the same test circuit 110.

Col. 7 of **BATES**, lines 1 - 3 explicitly discloses:

A particular I/O buffer 100(x) will be considered to have failed the test if the expected test data is not received at latch 230.

As such, the loopback self-test of **BATES** does not involve communication with any second buffer of any second group.

In particular, in **BATES**, when the self-tests are performed, none of the buffers 100 are assigned to any further second buffer. In **BATES**, there is no second plurality of buffers which, during the self-test, would be assigned to the buffers of the first group. See also, col. 6 of **BATES**, lines 27 - 29 ("If all of the test pattern signals have been issued (e.g., a sufficient number of test cycles have been run), latch 230 may be examined to determine whether a defect was detected in I/O buffer 100 during the transmission of previous test signals, process block 445").

Accordingly, **BATES** discloses a loopback test that directly detects a defect in a **respective tested buffer 100**, but neither teaches, nor suggests, connecting the respective tested buffer 100 to a second buffer assigned thereto. The direct testing of each buffer 100 of **BATES** is only possible because the loopback self-test signal

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

at the output of the driver 130 (Fig. 1 of **BATES**) is sent directly to the amplifier (145 of Fig. 1 of **BATES**, rather than to pad 135) so as to constitute a buffer-internal self-test loop. Otherwise, were each buffer 100 connected to or assigned to a second respective buffer (i.e., of a second group as claimed by Appellant) **it would not be possible to assign the defect to one particular buffer**. As such, it is clear that the buffers 100(1) - 100(n) of Fig. 5 of **BATES**, are not connected to a second group of buffers 100(1) - 100(n) (not illustrated in **BATES**) during the loopback self-test of the buffers 100(1) - 100(n).

Further, since each of the buffers 100 of **BATES** includes its own, respective test circuit 110 (as shown in Fig. 1 of **BATES**) having a test pattern generator 110 and a compare unit 220, as well as a stage 215, **each buffer 100 is capable of testing itself without the need to be connected to any second buffer**. Accordingly, it is not correct to interpret or conclude (as done on pages 2 and 3 of the **final Office Action**) that two respective self-testing buffers 100 would be assigned to one another. If this assumption were correct in the system disclosed in **BATES**, it would be questionable how the second buffer 100 of **BATES** would process the test signals received from the, first buffer.

Actually, however, each test circuit 110 of any respective buffer 100 of **BATES**, can only compare those test signal duplicates (originated and received back) which are generated by the same test circuit 110 (i.e., the test circuit of the buffer 100 containing the test circuit 110). Any assumption that two respective buffers 100 of **BATES**, would cooperate with one another is in direct conflict with the explicit

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

teachings of **BATES**, that each buffer 100 is testing itself (i.e. loopback "self-test").

As such, it can be seen that **BATES** fails to teach or suggest the assignment of second buffers of a second group to first buffers of a first group.

As such, **BATES** fails to teach or suggest, among other limitations of Appellant's claim 1: 1) that there is any 1:1-correspondence between buffers of a first group and buffers of a second group; and 2) that there is an electrical connection of the interface circuits to outside for enabling a self-test.

In contrast to Appellant's particularly claimed invention, **BATES** discloses, that the **electrical connection to outside** (i.e., the input/output pad 135 of Fig. 1 of **BATES**) **is unused when performing the self-test**, since **BATES** teaches that the self-test signals are sent from the driver 130 directly to the amplifier 145, in order to test the output driver (elements 115 to 130) and the input receiver (elements 145 and 150) of the buffer 100.

As such, it is believed that Appellant's claim 1 is patentable over **BATES**.

B. Appellant's independent claim 7 is further patentable over the BATES reference.

Appellant's claim 7 incorporates therein all limitations of claim 1, and thus, is patentable over **BATES** for, among other reasons, those discussed in Section IA, above, Section IA, above, being incorporated into this section by reference.

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

Further, Appellant's independent claim 7 recites, among other limitations:

receiving the test signals via the second group of interface circuits;
[emphasis added by Appellant]

As stated above in section IA, in contrast to Appellant's particularly claimed invention, **BATES** discloses, **that the electrical connection to outside** (i.e., the input/output pad 135 of Fig. 1 of **BATES**) is **unused when performing the self-test**, since **BATES** teaches that the self-test signals are sent from the driver 130 directly to the amplifier 145, in order to test the output driver (elements 115 to 130) and the input receiver (elements 145 and 150) of the buffer 100. A review of **BATES** makes clear that the test signals generated by the test circuit 110 of each buffer 100 **remain within the respective buffer 100**.

As such, for the reasons discussed thoroughly above, it can be seen that **BATES** additionally fails to teach or suggest, a self-test method, as in Appellant's claim 7, including, among other limitations receiving the test signals via the second group of interface circuits.

Appellant's claim 7 is thus, also believed to be patentable over the **BATES** reference.

C. Appellant's dependent claims 2 - 5 and 8 - 10 and 12 - 13 are additionally patentable over the BATES reference.

For the reasons disclosed above, in Sections IA and IB in connection with claims 1 and 7, among others, it is believed that the dependent claims 2 - 5 (depending,

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

ultimately, from claim 1) and claims 8 - 10 and 12 - 13 (depending, ultimately, from claim 7) are believed patentable over **BATES**.

- II. Whether or not claim 6 is obvious over **BATES** in view of U. S. Patent No. 6,704,897 to Takagi ("**TAKAGI**") under 35 U.S.C. §103.

In item 4 of the Office Action, claim 6 was rejected under 35 U.S.C. § 103(a) as allegedly being obvious over **BATES** in view of U. S. Patent No. 6,704,897 to Takagi ("**TAKAGI**").

Appellant's claim 6 depends from independent claim 1. For the reasons set forth above, in Section IA incorporated herein, Appellant's claim 1 is believed patentable over **BATES**. The **TAKAGI** reference, cited in the final Office Action in combination with **BATES** against Appellant's dependent claim 6, does not cure the deficiencies of **BATES**, discussed above in Section IA.

As such, Appellant's dependent claim 6 is patentable over **BATES** and **TAKAGI**, taken alone, or in combination.

- III. Whether or not claim 11 is obvious over **BATES** in view of U. S. Patent No. 5,751,151 to Levy et al ("**LEVY**") under 35 U.S.C. §103.

In item 5 of the Office Action, claim 11 was rejected under 35 U.S.C. § 103(a) as allegedly being obvious over **BATES** in view of U. S. Patent No. 5,751,151 to Levy et al ("**LEVY**").

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

Appellant's claim 11 depends from independent claim 7. For the reasons set forth above, in Sections IA and IB incorporated herein, Appellant's claim 7 is believed patentable over **BATES**. The **LEVY** reference, cited in the final Office Action in combination with **BATES** against Appellant's dependent claim 11, does not cure the deficiencies of **BATES**, discussed above in Sections IA and IB.

As such, Appellant's dependent claim 11 is patentable over **BATES** and **LEVY**, taken alone, or in combination.

IV. Conclusion.

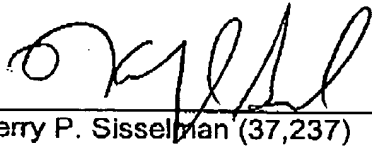
The **BATES** reference neither teaches, nor suggests all limitations of Appellant's independent claims 1 and 7. The **TAKAGI** and **LEVY** references, cited in the Office Action in combination with **BATES**, against certain of Appellant's dependent claims, do not cure the deficiencies of **BATES**, discussed above.

It is accordingly believed that none of the references, whether taken alone or in any combination, teach or suggest the features of claims 1 and 7. Claims 1 and 7 are, therefore, believed to be patentable over the art. The dependent claims are believed to be patentable as well because they all are ultimately dependent on claims 1 or 7.

The honorable Board is therefore respectfully urged to reverse the final rejection of the Primary Examiner.

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

Respectfully submitted,



Kerry P. Sisselman (37,237)

/av

Date: March 10, 2006
Lerner and Greenberg, P.A.
Post Office Box 2480
Hollywood, Florida 33022-2480
Tel: (954) 925-1100
Fax: (954) 925-1101

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

Claims Appendix:

1. A semiconductor module with a configuration for the self-test of a plurality of bidirectionally operating interface circuits, comprising:

first and second equally sized groups of interface circuits, wherein each interface circuit of said first group is assigned exactly one interface circuit of said second group;

a respective electrical connection of the interface circuits of said first and second groups to outside of the semiconductor module, for enabling a self-test;

a first circuit connected to said first group and serving to generate test signals to be multiplexed in and output via said interface circuits of said first group;

a second circuit connected to said second group for receiving and processing test signals received via said interface circuits of said second group; and

a respective separate voltage supply for said first and second groups of interface circuits.

2. The semiconductor module according to claim 1, which further comprises

a third circuit connected to said second group and serving to generate test signals to be multiplexed in and output via said interface circuits of said second group; and

wherein said second circuit is connected to said first group for receiving and processing test signals received via said interface circuits of said first group.

Claims Appendix: Page 1 of 4

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

3. The semiconductor module according to claim 1, wherein said circuit for generating test signals includes a pseudorandom number generator.
4. The semiconductor module according to claim 1, wherein said circuit for generating test signals includes a linear feedback shift register.
5. The semiconductor module according to claim 1, wherein said circuit for receiving and processing test signals includes a circuit for calculating a signature from the test signals.
6. The semiconductor module according to claim 1, wherein said circuit for receiving and processing test signals includes a multiple input shift register.
7. A self-test method, which comprises the following steps:

providing a semiconductor module according to claim 1 and testing the bidirectionally operating interface circuits of the semiconductor module by

connecting the assigned interface circuits of the first and second groups of interface circuits outside the module;

supplying the two groups of interface circuits with a separate supply voltage;

generating test signals, coupling in the test signals, and outputting the test signals via the first group of interface circuits;

Claims Appendix: Page 2 of 4

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

receiving the test signals via the second group of interface circuits; and

comparing the received test signals with prescribed values for fault-free functioning of the interface circuits.

8. The method according to claim 7, which comprises:

after processing the test signals output by the first group and received by the second group of interface circuits, reversing a test direction,

such that the test signals generated by the circuit that interacts with the second group are output via the second group of interface circuits and are received via the first group of interface circuits; and receiving and comparing test signals with prescribed values for fault-free functioning of the interface circuits.

9. The method according to claim 7, which comprises generating test signals with pseudorandom distribution, calculating a signature from the received test signals, and comparing the signature with a prescribed signature for fault-free functioning of the interface circuits.

10. The method according to claim 7, which comprises influencing a connection of the assigned interface circuits in order to include an influence of interference quantities in the self-test.

Claims Appendix: Page 3 of 4

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

11. The method according to claim 10, wherein the influencing step comprises selecting an influence from a group consisting of resistive, capacitive, and inductive influences.

12. The method according to claim 7, which comprises modulating low-frequency signal voltages onto at least one of the supply voltages of the interface groups.

13. The method according to claim 12, which comprises modulating two low-frequency sinusoidal signals of different frequency onto both supply voltages.

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

Evidence Appendix:

No evidence pursuant to §§ 1.130, 1.131, or 1.132 or any other evidence has been entered by the Examiner and relied upon by appellant in the appeal.

Evidence Appendix: Page 1 of 1

Application No. 10/075,656
Brief on Appeal, dated 6/19/06

Related Proceedings Appendix:

Since there are no prior or pending appeals, interferences or judicial proceedings which may be related to, directly affect or be directly affected by or have a bearing on the Board's decision in this appeal, no copies of decision rendered by a court or the Board are available.

Related Proceedings Appendix: Page 1 of 1